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CTIA

*Building The Wireless Future™*

Cellular Telecommunications &amp; Internet Association

October 23, 2002

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
12th Street Lobby, TW-A325  
Washington, DC 20554

**Re: Ex Parte Presentation**  
**Docket No. 96-45; Docket No. 98-171; Docket No. 90-571;**  
**Docket No. 92-237; CC Docket No. 95-116; Docket No. 98-170;**  
**NSD File No. L-00-72**

Dear Ms. Dortch:

On October 23, 2002, the Cellular Telecommunications & Internet Association ("CTIA") represented by Michael Altschul, Senior Vice President for Policy and Administration and General Counsel, Diane Cornell, Vice President for Regulatory Policy, along with Glenn Rabin, Vice President for Federal Communications, ALLTEL, Peter Connolly, representing US Cellular, and Doug Brandon, Vice President External Affairs and Law, AT&T Wireless Services, Inc., met with Jordan Goldstein, Senior Legal Advisor for Commissioner Copps. CTIA reiterated its position that the existing revenue-based Universal Service Fund ("USF") assessment system should be retained as the most fair and equitable manner of collecting USF funds. The meeting began with the presentation of an interstate traffic study containing information from six wireless service providers. As detailed in the attached study, the percentage of interstate traffic carried by the six wireless service providers ranged from 10 percent to 28.5 percent.

Based on these studies, CTIA acknowledged that it would be appropriate to reexamine the wireless safe-harbor proxy. CTIA also noted that a revenue-based system, unlike a connection-based fee, would comport with Section 254(d) of the 1996 Act. Furthermore, preservation of the revenue-based USF collection system would also prevent disproportionate harm to no-use, low-use and low-income wireless service users. In particular, the parties discussed the material in the attached presentation.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Michael F. Altschul

Michael F. Altschul

Cc: Jordan Goldstein

